

Exhibit N

Estate of Joseph O'Toole

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

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JOHNN BASCI, et al,

AFFIDAVIT OF
CHRISTINE O'TOOLE

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

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STATE OF NEW YORK)
 : SS.:
COUNTY OF ROCKLAND)

CHRISTINE O'TOOLE, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 11 Garrecht Place, West Nyack, New York 10994.
2. I am currently 63 years old, having been born on November 28, 1958.
3. I am the wife of Joseph O'Toole, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my husband's estate.
4. My husband passed away from bile duct cancer on December 12, 2016, at the age of 61. It has been medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.
5. On August 11, 2017, I was issued Letters Testamentary on behalf of Joseph's estate by the Rockland County, New York Surrogate's Court.

6. My husband was the kindest man you could ever want to meet. I met him when I was 19 years old, married him at 20 years old, and spent 38 very happy years of marriage with him. Together, we raised three children and had five grandchildren at the time of his passing. He was everything to me, and we did everything together. For example, we enjoyed sailing, took a trip to Ireland, and went on several cruises with our family. He was a phenomenal husband, father, and grandfather. He was my best friend.

7. Joseph was a firefighter at a firehouse in the Bronx. He was working a side job the morning of 9/11. He was called into work shortly after the collapse of the buildings at around 11:00 a.m., and he arrived at the firehouse later that morning. He traveled to Ground Zero that day to assist with the search and recovery efforts. I believe he spent the next 48 to 72 hours there, as I had no contact with him. After this initial period, he was detailed permanently to Ground Zero for about 9 months. He continued working in the World Trade Center area until the following June. My family and I did not see him much over this period, as he was constantly at his firehouse or down in the World Trade Center area.

8. Besides helping with the search and recovery and later cleanup efforts, Joseph also spent a lot of time providing emotional support to people in the aftermath of the attacks. He would go to the nearby St. Paul's Chapel to meet up with various people looking for their missing loved ones and to provide support to them.

9. Joseph was an avid sailor, and sailing was a hobby he really enjoyed. He was competing in the Newport to Bermuda sail in 2012 when he got sick. On the way back to Newport, he served as captain and became seasick, the first time I remember this happening in his life. After returning home in the following days, he was still not feeling well and had a pain in his side. He woke up the next day still sick, and I told him that he needed to see a doctor. After going to our

daughter's house for dinner that Sunday, his appearance was notably yellow after developing jaundice. He also had experienced bowel issues and symptoms, so he went to see the doctor for an emergency visit the next day. That doctor immediately recognized something was wrong, and several tests were conducted on Joseph. They were unable to conduct a biopsy on a mass they had found, so we went, and had Joseph admitted to, Memorial Sloan Kettering Cancer Center that following Thursday after speaking with his sister, who was a nurse there. After several more tests, such as an MRI, CT scan, and blood tests, the doctor came and told us that evening about the bile duct cancer diagnosis.

10. Joseph began undergoing treatment for his cancer immediately, and he had his first surgery to have a drainage tube put in the day after his diagnosis. He also started chemotherapy treatments and later underwent radiation treatments. He experienced a heart attack in April 2016 due to chemotherapy treatments. It led to a series of side effects that ultimately resulted in him falling into a coma for four or five days. The radiation treatments also led to side effects, and Joseph often experienced severe bleeding. We would often have to rush to the hospital for a blood transfusion whenever this bleeding would occur. It felt like we had been living minute to minute for almost two years, and we would sometimes need to rush to the hospital in the middle of the night so that Joseph could get the emergency treatment he needed. There was a constant cycle of this. It was horrific and horrible.

11. These treatments also had a severe financial impact on our family because insurance did not cover many of his treatments and medications. For example, one pill he needed to take for his weekly chemotherapy treatments cost more than \$2,000 a month. This is in addition to the thousands of dollars in other out-of-pocket expenses for medication, treatments, and hospital

visits that we were responsible for until his cancer was linked to his exposure to the toxins at the World Trade Center in the aftermath of the attacks.

12. My husband also experienced other adverse effects from his cancer. He was a strong man and firefighter who liked doing as much as he could himself around the house, such as completing various projects and taking care of our yard. However, his body withered away to half of its size with his cancer, and he could no longer do any of these activities or take care of the house like he used to. Sometimes, he would sit down on the couch and would be unable to get up. He also lost the ability to do simple things for himself, such as showering or using the restroom. And as his body continued to deteriorate, Joseph also had trouble breathing and needed an inhaler. He was distraught with the situation.

13. One particular hobby he lost the ability to do was sailing. He owned and used his sailboat for about 20 years, and we had taken trips on it together. However, one day, he could not easily get off the boat and across the dock. We realized that would be the end of his sailing and sadly got rid of the boat shortly afterward. This broke his heart.

14. Joseph was in constant pain too. One particularly noticeable and damaging side effect among the many he experienced from his cancer was encephalopathy. He would experience sudden episodes of what seemed like dementia. He would forget where he was and who he was with. I learned to recognize some of the signs and became responsible for managing his medication to control these episodes. Unfortunately, sometimes medication could not control the episodes, so he continued to suffer from encephalopathy. It could happen at any moment.

15. These experiences and the health decline negatively affected Joseph's emotional well-being. He had been such a strong man, and his illness took everything from him. He was no

longer able to do anything. This was devastating for him. Joseph also had post-traumatic stress disorder, which did not help his emotional state.

16. Joseph was my rock, and he had taken care of me since I was 19. It is difficult living without him, and I feel alone. He was a huge part of our children's lives, and it breaks my heart that he is no longer there for him or the grandchildren. He never even had the opportunity to meet three of our now eight grandchildren. He was an amazing man, and everything was stolen from him. I want to make sure no one ever forgets him.



CHRISTINE O'TOOLE

Sworn to before me this
23rd day of June, 2022



Notary Public

LORI GAI GANO
NOTARY PUBLIC, STATE OF NEW YORK
REGISTRATION NO. 01GA6346324
QUALIFIED IN ROCKLAND COUNTY
COMMISSION EXPIRES 08/08/2024

Estate of Robert Petrone

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

JOHNN BASCI, et al.,

**AFFIDAVIT OF
LEANNA PETRONE**

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK)

: SS.:

COUNTY OF RICHMOND)

LEANNA PETRONE, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 147 Burke Avenue, Staten Island New York 10314.

2. My current age is 33, having been born on June 15, 1988.

3. I am the daughter of Robert Petrone, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my father's estate.

4. My father passed away from bladder cancer on December 12, 2016, at the age of 59. It was medically determined by the World Trade Center Health Program that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. On January 9, 2017, I was appointed personal representative of my father's estate by the Richmond County, New York Surrogate's court.

6. My father and I were very close. He was just an amazing father. My sister and I had a difficult childhood, as our mother was very sick growing up and our parents got divorced. Despite

that, all I remember is that my dad took care of us. Everything he did was for my sister and me. He worked many jobs to support us. There were a lot of bills to pay. He sent my sister and me to the best Catholic private schools. We never went without. He took us on vacation with our friends. Any sport we had an interest in, my dad would buy us the equipment and practice with us. When we were teens, our mom moved to Florida, and my sister and I moved in with our father full-time. We had a great family life. He even took care of my sick mother, who was his ex-wife. He paid for everything for her—bills, groceries, anything she needed—out of the goodness of his heart. He never wanted the burden to fall on my sister and me.

7. On September 11, 2001, my father responded to Ground Zero almost immediately. He was a retired NYPD officer, and he and his former partner rushed to the scene right away. He was there for two weeks to help with rescue and recovery, doing what he could. He didn't tell us much about what he saw at the World Trade Center. He told me it was really difficult, but he didn't like to talk about it.

8. When my father got sick, he tried to protect us in any way possible from the news. Only after he passed did I find the documents of his original diagnosis. He had biopsies done a few days before my engagement party, in early October 2013. Those biopsies showed he had bladder cancer. He didn't tell us he was diagnosed with cancer until the end of October. He was in a lot of pain, but always hid it from us. He wrote letters describing his pain, which I also found after his death. It was hard to read. My father went through chemotherapy three out of every four weeks starting in October, through the end of 2013, and again from January to April 2014. He had a terrible reaction to the medication, and he lost all his hair. I'll never forget having to shave his head. In January 2014, he had a major, eight-hour surgery to remove his tumor. He had his bladder re-sectioned. I had never seen him in so much pain. Reading his letters, I now know that he felt even worse than what he let on.

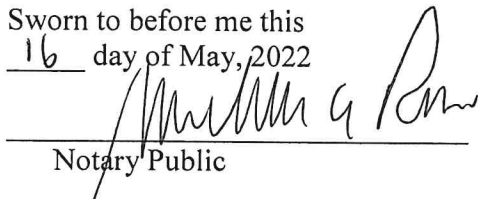
9. My father suffered many symptoms of bladder cancer as well as side effects from the chemotherapy. My sister and I saw his pain, fatigue, and hair loss get worse over time. He looked pale and gaunt, and he lost a lot of weight. After the surgery in 2014, he started to have a lot of pain in his back, to the point that he couldn't even walk very far. He constantly had to use a catheter, so his movement was restricted. He experienced lymphedema, which made his whole body swollen. He had neuropathy from the second round of chemotherapy, so he couldn't feel his hands and feet. I know that really bothered him.

10. His mental health was definitely impacted by the cancer. He became more easily frustrated. He was more on edge when he was sick. He didn't really know how to handle not being able to do anything for himself anymore. He wasn't used to having others take care of him. He was angry with his situation—his temper was heightened, and his reactions to things were worse. The cancer affected his brain toward the end. He had memory issues. He also started hallucinating and would say things that didn't make sense.

11. Everybody loved my father. Even the people who he disagreed with loved him. People loved him because they knew he'd always be there for them. Losing him was a loss not just for my sister and me, but for our community. Some people who only met him once still talk about their experience with him. He welcomed people with open arms. He genuinely was a special person.


LEANNA PETRONE

Sworn to before me this
16 day of May, 2022


Notary Public

MICHELLE A. RUSSO
NOTARY PUBLIC, STATE OF NEW YORK
01RU6119903
QUALIFIED IN RICHMOND COUNTY
EXPIRES 12/06/2024

Estate of Michael V. Quinn

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

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JOHNN BASCI, et al.,

**AFFIDAVIT OF
MADELINE ANN QUINN**

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK)

: SS.:

COUNTY OF QUEENS)

MADELINE ANN QUINN, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 223-23 57th Avenue, Bayside, New York 11364.

2. I am currently 67 years old, having been born on November 24, 1954.

3. I am the wife of Michael V. Quinn, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my husband's estate.

4. My husband passed away from cancers of the prostate and lung on June 5, 2016. It was medically determined by the World Trade Center Health Program that these illnesses were causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. On July 20, 2017, I was issued Letters of Administration on behalf of my husband's estate by the Surrogate's Court of the State of New York, Queens County.

6. Michael and I were happily married for 38 years. He was not only my husband, he was my best friend. We were inseparable and had a beautiful life together. Michael and I did

everything together. We liked to take long walks and just talk, go for runs, and go shopping. We enjoyed vacationing, or just sitting on the patio listening to music. Our favorite time was Friday nights, when we would order in pizza and watch a movie. Our most memorable experience was the birth of our son, Michael. My husband was so proud and happy when he became a father.

7. Michael was an NYPD first responder who was at Ground Zero conducting search and recovery. He began on September 12th and worked each day for several months on the pile, identifying victims and digging through the rubble. My husband was very diligent in going for screenings with the World Trade Center Health Program, and he followed up with his own doctors on a regular basis. After two separate biopsies, he was diagnosed with prostate cancer, and later with lung cancer, both of which were linked to his time at Ground Zero.

8. Prior to my husband's illness, he was a very strong, healthy, ambitious man. He was an avid runner and a black belt in karate. He would either run or do karate before going to work. As his illness progressed, all that changed. He didn't have the energy or stamina to do any of the things that he loved. It was an effort for him to simply function. He became progressively weaker during his illness and was unable to do anything that required any effort. On many occasions, he would experience vasovagal syncope, which causes fainting resulting from certain stressful triggers. These triggers would create a temporary decline in blood flow to the brain, leading to a sudden drop in blood pressure and heart rate which would cause him to faint. He had many of these instances and could not remember what happened. He required constant care and could not be left alone.

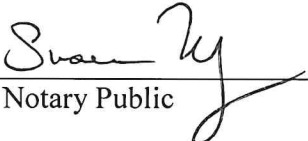
9. My husband was honored to be an Assistant Chief in the NYPD. When he was diagnosed with prostate cancer, he was overwhelmed, and it was difficult for him to accept the diagnosis. Reality set in, and he had to leave his job due to his disability. His mental and emotional state changed drastically. He became agitated and unable to focus on day-to-day activities because he was so concerned about his health and how he was going to deal with it. He became withdrawn, but tried to overcome his feelings of fear, anxiety, and insecurity. He would always tell me, "I'm good." Michael's main concern was not being able to take care of his family. This worry deeply affected his mental well-being. Being forced to leave his job due to his disability took an emotional toll on him, and he was absolutely devastated.

10. His last hospital admission, which lasted three weeks, was extremely emotional, stressful, and sad for me and our family. I lived in the hospital ICU for those three weeks, never leaving his bedside. My sister and son would come to the hospital every day to keep us company. My husband knew that his family was there for him. Unfortunately, he never recovered and passed away in the hospital.

11. Michael's passing was a devastating tragedy which took the love of my life. I can honestly say that my life will never be the same without my beloved husband. My heart is forever broken. I love and miss my husband more than ever! He is forever in my heart. This tragedy was a needless loss of a beautiful life. Someone should be held accountable for this senseless loss.


MADELINE ANN QUINN

Sworn to before me this
17th day of May, 2022


Notary Public

Susana Ung
Notary Public, New York
Queens County Lic# 01UN6343297
Commission Expires: 6/6/2024